

19 MAG 8672

Approved:

Elizabeth A. Espinosa
ELIZABETH A. ESPINOSA

Assistant United States Attorney

DOC # 1

Before: HONORABLE HENRY B. PITMAN
United States Magistrate Judge
Southern District of New York

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UNITED STATES OF AMERICA : COMPLAINT
: :
- v. - : :
JONATHAN SKOLNICK, : :
: :
: :
: :
Defendant. : :
: :
----- X

Violations of
18 U.S.C.
§§ 2251, 2252A(a)(2)(B),
(a)(5)(B), (b)(1),
(b)(2),
2422(b), 875(d) and 2

COUNTY OF OFFENSE:
BRONX

SOUTHERN DISTRICT OF NEW YORK, ss.:

AARON SPIVACK, being duly sworn, deposes and says that he is a Special Agent with the Federal Bureau of Investigation ("FBI"), and charges as follows:

COUNT ONE

(Production of Child Pornography)

1. From in or around March 2019 up to and including in or around September 2019 in the Southern District of New York and elsewhere, JONATHAN SKOLNICK, the defendant, willfully and knowingly attempted to and did employ, use, persuade, induce, entice, and coerce a minor with the intent that such minor engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, and for the purpose of transmitting a live visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using a means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce, and mailed, which visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and was actually transported and

transmitted using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce and mailed, to wit, SKOLNICK enticed a minor ("Victim-1") to engage in sexually explicit conduct and to send SKOLNICK nude and sexually explicit photographs of Victim-1 by emails from the Bronx, New York.

(Title 18, United States Code, Sections 2251(a), (e), and 2.)

COUNT TWO

(Possession of Child Pornography)

2. From at least in or about March 2019 up to and including at least on or about September 13, 2019, in the Southern District of New York and elsewhere, JONATHAN SKOLNICK, the defendant, knowingly did possess and access with intent to view, and attempt to possess and access with intent to view, a book, magazine, periodical, film, videotape, computer disk, and other material containing an image of child pornography that had been mailed, and shipped and transported using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and that was produced using materials that had been mailed, and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, to wit, SKOLNICK possessed images and videos of child pornography in his residence in the Bronx, New York.

(Title 18, United States Code, Sections 2252A(a)(5)(B), (b)(2), and 2.)

COUNT THREE

(Receipt of Child Pornography)

3. Between in or around March 2019 and in or around September 2019, in the Southern District of New York and elsewhere, JONATHAN SKOLNICK, the defendant, knowingly did receive and attempt to receive material that contains child pornography that had been mailed, and using a means and facility of interstate and foreign commerce shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, to wit, SKOLNICK received nude and sexually explicit photographs of Victim-1 over the Internet using an internet-enabled computer in his residence in the Bronx, New York.

(Title 18, United States Code, Sections 2252A(a)(2)(B), (b)(1), and 2.)

COUNT FOUR

(Inducement of a Minor to Engage in Sexual Activity)

4. Between at least in or about March 2019 and in or about September 2019, in the Southern District of New York and elsewhere, JONATHAN SKOLNICK, the defendant, used facilities and means of interstate commerce to knowingly persuade, induce, entice, and coerce an individual who had not attained the age of 18 years to engage in sexual activity for which a person can be charged with a criminal offense, and attempted to do the same, to wit, SKOLNICK used a cellphone and email to communicate with Victim-1 to persuade Victim-1 to take nude and sexually explicit photographs of Victim-1 and send them to SKOLNICK, in violation of Title 18, United States Code, Sections 2251(a) and 2.

(Title 18, United States Code, Sections 2422(b) and 2.)

COUNT FIVE

(Extortionate Communications)

5. Between at least on or about September 9, 2019 and on or about September 13, 2019, in the Southern District of New York and elsewhere, JONATHAN SKOLNICK, the defendant, with intent to extort from a person things of value, transmitted in interstate and foreign commerce a communication containing a threat to injure the property and reputation of the addressee, to wit, SKOLNICK threatened to release nude and sexually explicit photographs of Victim-1 if Victim-1 did not send him additional sexually explicit photographs.

(Title 18, United States Code, Sections 875(d) and 2).

The bases for my knowledge and for the foregoing charge are, in part, as follows:

6. I am a Special Agent with the FBI, currently assigned to the crimes against children squad. I have been personally involved in the investigation of this matter, and I base this affidavit on that experience, on my conversations with other law enforcement officials, and on my examination of various reports and records. Because this affidavit is being submitted for the limited purpose of demonstrating probable cause, it does not include all the facts I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

7. I have personally participated in the investigation of this matter. I am familiar with the facts and circumstances of this investigation from my personal participation in the investigation, my review of documents, my training and experience, and discussions I have had with other law enforcement personnel. Because this affidavit is being submitted for the limited purpose of demonstrating probable cause, it does not include all the facts I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

8. Based on my participation in this investigation, my discussions with other law enforcement agents, and my review of reports and records, I have learned that:

a. In or around March 2019, Victim-1, a 14-year-old male began communicating with what he believed to be several teenage girls that were about his own age. These "girls" used several names, including, among other names, "Molly Dejmajal," "Tina Warner," "Anna Freed," and "the girl who likes you" and communicated with Victim-1 by text message, using spoofed telephone numbers.¹

b. Victim-1 never communicated with the "girls" in group communications. Typically, one "girl" would introduce him to the next "girl." The communications with each "girl" were platonic in nature at first and then became sexual. In each case, the "girls" would send Victim-1 photographs of naked females, claiming that these were photographs of themselves. The "girls" would then ask Victim-1 to email nude and sexually explicit photographs of himself.

c. In response to requests from the "girls," between in or around March 2019 and in or around June 2019, Victim-1 emailed nude and sexually explicit photographs of himself to at least two email accounts, including to "mollydejmal@gmail.com" ("Account-1") and "girlwholikesyou@protonmail.com" ("Account-2"). These photographs included photographs of Victim-1 that showed his face and [REDACTED]. The "girls" also asked Victim-1 to [REDACTED].

¹A spoofed telephone number is a number that is altered to appear on the recipient's telephone as if it was sent by someone other than the true sender, that is, the number appears altered in a way that conceals the identity of the sender.

[REDACTED]

d. In or around June 2019, Victim-1 stopped communicating with the "girls." The "girls" began contacting him again in or around late August 2019 or in or around early September 2019.

9. Based on my involvement in the investigation and my review of telephone and email communications, I know that on or about September 9, 2019, an individual using the name "Molly Dejmal"—the same name previously used in connection with Account-1—texted Victim-1 from a spoofed telephone number. The messages became increasingly threatening in nature, causing Victim-1 to fear that the "girls" would release the nude photographs that he had sent to Account-1 and Account-2. The messages stated:

Molly Dejmal: K just give me one fact as proof its really u not ur parents... something I know already that you'd never text in front of them

Victim-1: I've sent you pics

Molly Dejmal: Of?

Victim-1: My whole self

Molly Dejmal: K

Molly Dejmal: Do u realize when u run off in the middle of pics you leave girls terrified that ur trying to show there [sic] pics to someone

Victim-1: No. And yes

Molly Dejmal: We were terrified and couldn't sleep for days cuz we thought you had a plan against us

Molly Dejmal: what's no and yes?

Molly Dejmal: ?

Molly Dejmal: Ignoring again? No problem

Molly Dejmal: Really hope it's going to be ok but I can't fix it when you don't respond so just be aware that it's your choice not to respond

Molly Dejmal: So instead of making it better you cause it to

happen again

10. Based on my conversations with other law enforcement agents and my review of text message communications, I know that on or about September 10, 2019, an individual sent Victim-1 a text message from a spoofed number that listed Victim-1's name as the sender. The message stated "Apparently you don't care who knows."

11. Based on my conversations with other law enforcement agents and my review of email communications, I know that on or about September 11, 2019, Victim-1 received an email from a particular email account ("Account-3"). The email address used to send messages from Account-3 included Victim-1's first and last names with a different middle initial. The email stated "blocking is just the wrong idea your [sic] making it worse for you now[.]"

12. Based on my conversations with other law enforcement agents and my review of email communications, I know that on or about September 12, 2019, Victim-1 received two threatening text messages in the name of "Tina Warner" from a spoofed telephone number. The first message stated: "Well you still haven't apologized [sic] or explained so who will I text next[.]" The second message stated: "5 choices is too many to choose from[.]"

13.



14.



15. Based on my review of information provided by an email service provider ("Email Provider-1"), I know that Account-1 had been created on July 12, 2015 and between on or about April 4, 2019 and on or about September 13, 2019, had only been accessed by a particular Internet Protocol ("IP") address ("IP Address-1").

16. Based on my review of information provided by Email Provider-1, I know that Account-3 was created on or about August 22, 2019, and had only been accessed by IP Address-1.

17. Based on my review of information provided by an internet service provider ("ISP-1"), I know that IP Address-1 is registered to JONATHAN SKOLNICK, the defendant, at a particular apartment located in the Bronx, New York (the "Apartment"). IP Address-1 has been registered to SKOLNICK at the Apartment since in or around November 2018.

18. Based on information from law enforcement databases, I know that JONATHAN SKOLNICK, the defendant is associated with the Apartment and has lived there since at least in or around November 2018.

19. On or about September 13, 2019, I, along with other law enforcement officers, executed a court-authorized search warrant (the "Search Warrant") at the Apartment. During the execution of the Search Warrant, law enforcement agents recovered, among other things, two mobile phones and a laptop (the "Seized Items").

20. JONATHAN SKOLNICK, the defendant, arrived at the Apartment after execution of the Search Warrant. I and two other law enforcement officer conducted an interview of SKOLNICK. During the interview, SKOLNICK stated, in substance and in part, that:

a. SKOLNICK stated that he lived alone in the Apartment.

b. SKOLNICK acknowledged that the Seized Items belonged to him.

c. SKOLNICK acknowledged using email accounts, including Account-1, Account-2, and Account-3, to pose as several teenage girls, including the "girls" that communicated with Victim-1. He said that he used Account-1, Account-2, and Account-3 to send emails and text messages from spoofed telephone numbers.

d. SKOLNICK stated that he had asked Victim-1 to send him nude and sexually explicit photographs and that he received

nude and sexually explicit photographs from Victim-1. SKOLNICK acknowledged that those images contained child pornography.

e. SKOLNICK stated that he had sent the text messages described in paragraphs 9 through 13 above, and acknowledged sending text messages to Individual-1.

f. SKOLNICK stated that he had requested sexually explicit photographs from approximately 20 to 25 victims. SKOLNICK said that the majority of the victims were minors.


21. Based on my involvement in the investigation and my review of materials seized pursuant to the Search Warrant, I know that law enforcement agents identified approximately six images containing child pornography that Victim-1 sent to JONATHAN SKOLNICK, the defendant.

WHEREFORE, the deponent respectfully requests that JONATHAN SKOLNICK, the defendant, be imprisoned or bailed, as the case may be.



AARON SPIVACK
Special Agent
Federal Bureau of Investigation

Sworn to before me this
14th day of September, 2019


HONORABLE HENRY B. PITMAN
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK